

# **EXHIBIT “7”**

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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

NICOLE DIANE LA CARIA, on behalf of  
herself and all others similarly situated;

Plaintiff,

vs.

NORTHSTAR LOCATION SERVICES, LLC,  
A New York limited liability company, and  
JOHN DOES 1-10.

Defendant.

Case No.: 2:18-cv-00317

**DECLARATION OF NICOLE DIANE LA CARIA  
IN SUPPORT OF  
PLAINTIFF'S MOTION FOR CLASS CERTIFICATION**

I, O. Randolph Bragg, declare under penalty of perjury, as provided for by the laws of the United States, 28 U.S.C. §1746, that the following statements are true:

1. I am one of the attorneys representing Plaintiff Nicole Diane La Caria and the class certified in this matter.

2. I am a member in good standing of the bars of the following courts:

Supreme Court of the United States  
Washington, D.C.  
August 7, 1992

Supreme Court of Appeals of West Virginia -- inactive  
Charleston, West Virginia  
May 22, 1973

Supreme Court of Pennsylvania – inactive  
Harrisburg, Pennsylvania  
May 20, 1974

Supreme Court of the State of Delaware – inactive  
Wilmington and Dover, Delaware  
January 23, 1987

Supreme Court of Illinois  
Chicago, Illinois  
July 5, 1994

U.S. Court of Appeals for the Second Circuit  
New York, New York  
November 6, 1986

U.S. Court of Appeals of the Third Circuit  
Philadelphia, Pennsylvania  
February 21, 1979

U.S. Court of Appeals for the Fourth Circuit  
Richmond, Virginia  
February 7, 1986

U.S. Court of Appeals for the Fifth Circuit  
New Orleans, Louisiana  
July 23, 1999

U.S. Court of Appeals for the Sixth Circuit  
Cincinnati, Ohio  
December 26, 1991

U.S. Court of Appeals for the Seventh Circuit  
Chicago, Illinois  
April 15, 1994

U.S. Court of Appeals for the Eighth Circuit  
St. Louis, Missouri  
September 21, 1998

U.S. Court of Appeals for the Ninth Circuit  
San Francisco, California  
March 14, 1997

U.S. Court of Appeals for the Tenth Circuit  
Denver, Colorado  
May 22, 1997

U.S. Court of Appeals for the Eleventh Circuit  
Atlanta, Georgia

August 24, 1988

U.S. District Court for the Southern District of West Virginia  
Charleston, West Virginia  
May 22, 1973

U.S. District Court for the Middle District of Pennsylvania  
Scranton, Pennsylvania  
July 12, 1974

U.S. District Court for the Eastern District of Pennsylvania  
Philadelphia, Pennsylvania  
June 25, 1982

U.S. District Court for the District of Delaware  
Wilmington, Delaware  
January 30, 1987

U.S. District Court for the Western District of New York  
Rochester, New York  
October 5, 1987

U.S. District Court for the Northern District of New York  
Utica, New York  
December 15, 1989

U.S. District Court for the Northern District of Illinois  
Chicago, Illinois  
May 10, 1994

U.S. District Court for the Central District of Illinois  
Peoria, Illinois  
April 29, 1996

U.S. District Court for the District of Arizona – inactive  
Phoenix, Arizona  
January 11, 1996

U.S. District Court for the Western District of Michigan  
Grand Rapids, Michigan  
June 7, 1996

U.S. District Court for the Eastern District of Michigan  
Detroit Michigan  
December, 1997

U.S. District Court for the Western District of Wisconsin  
Madison, Wisconsin  
December 21, 1998

U.S. District Court for the Eastern District of Wisconsin  
Milwaukee, Wisconsin  
July 12, 2000

U.S. District Court for the Northern District of Texas  
Dallas, Texas  
August 28, 2000

U.S. District Court for the District of Colorado  
Denver, Colorado  
December 9, 2002

U.S. District Court for the Northern District of Indiana  
South Bend, Indiana  
July 13, 2005

U.S. District Court for the Southern District of Illinois  
Benton, Illinois  
July 30, 2007

U.S. District Court for the District of Nebraska  
Omaha, Nebraska  
June 3, 2008

3 I am a 1973 graduate of the West Virginia University College of Law.

4 From May 1973 until August 1985, I was employed by Legal Services  
Corporation-funded programs in West Virginia and Pennsylvania. From August  
1985 until October 1993, I served as a Litigation Coordinator with the UAW Legal  
Services Plan. From April 1, 1994 through August 30, 1995, I was associated with  
the law firm of Edelman & Combs in Chicago, Illinois.

5. On September 15, 1995, I opened my law office, as a solo practice limited to  
the representation of persons in consumer rights litigation, both individual and class  
cases.

6. On February 1, 1997, I merged my practice with Horwitz, Horwitz and  
Associates and continue to limit my practice to the representation of individuals in  
consumer issues in class actions primarily brought pursuant to the Fair Debt  
Collection Practices Act, 15 U.S.C. §§1692 *et seq.*

7. Since 1990 I have been a contributing author to National Consumer Law  
Center's Fair Debt Collection (9th ed. 2018) and annual supplements. I have also  
written Chapter 5, "Fair Debt Collection Practices Act," Ohio Consumer Law (1995  
ed. through 2018-19 ed.). "Fair Debt Collection: The Need For Private  
Enforcement", published at Loyola Consumer Law Reporter, Volume 7, Number 3,

Page 89 (Spring 1995), was written by myself and Daniel A. Edelman.

8. I was an original member of the National Association of Consumer Advocates and from October 1996 through October 2000 serviced on the Board of Directors.

9. For the past several years through October 2018 I have participated as one of the Consumer Advocate Advisors to *Consumer Financial Services Law Report* produced by West Publishing.

10. In November 2006 I was named the Consumer Attorney of the Year by the National Association of Consumer Advocates.

11. On November 13, 2010 I received the Vern Countryman Award for "Excellence and Dedication in the practice of consumer law on behalf of low-income consumers" from the National Consumer Law Center.

12. On October 13, 2011 the Santa Clara University School of Law Katherine & George Alexander Community Law Center presented me with the Community Award for "dedication to consumers and consumer law."

13. I have lectured to professional groups on consumer law issues including:

March 12-13, 2015	Improper Claims for Interest Fair Debt Collection Practices Act National Consumer Law Center	Washington, DC
April 5, 2013	Debt Collection in the Modern Economy	Chicago, IL



Loyola University School of Law

February 23-24, 2012	Fair Debt Collection Practices Act National Consumer Law Center	New Orleans, LA
March 3-4, 2011	Fair Debt Collection Practices Act National Consumer Law Center	Seattle, WA
February 27-28, 2009	ESI Discovery Fair Debt Collection Practices Act National Consumer Law Center	San Diego, CA
October 24-26, 2008	Co-Counseling Consumer Cases National Consumer Law Center	Portland, OR
March 27-29, 2008	Fair Debt Collection Practices Act National Consumer Law Center	Nashville, VA
March 23-25, 2007	Fair Debt Collection Practices Act National Consumer Law Center	Tucson, Arizona
February 25-26, 2006	Fair Debt Collection Practices Act National Consumer Law Center	Austin, Texas
October 20-21, 2005	Consumer Law 2005	Missouri Bar CLE Kansas City & St. Louis, MO
March 13-14, 2005	Fair Debt Collection	National

	Practices Act	Association of Consumer Advocates Crystal City, VA
July 29, 2004	Fair Debt Collection Practices Act	Student Legal Services Chicago, Illinois
April 23, 2004	Montana Consumer Law Summit	Missoula, MT
February 21-22, 2004	Fair Debt Collection Practices Act National Consumer Law Center	Kansas City, MO
October 28, 2002	Class Action Symposium National Consumer Law Center	Atlanta, Georgia
November 6, 2001	North American Collection Agency Regulatory Association	Denver, Colorado
April and May 2000	Consumer Financial Services Litigation	New York- San Francisco
March 2007	Practicing Law Institute	Chicago
November 10, 2000	Fair Credit Reporting Act Fair Debt Collection Practices Act	Michigan Poverty Law Program Lansing, Michigan
September 19, 1997	Fair Debt Collection Practices Act	Michigan State Bar Detroit, Michigan

April 25, 1997	Fair Debt Collection Practices Act and Consumer Class Actions	VA Trial Lawyers Association Richmond, VA
September 20, 1996 October 8, 1999 October 11, 2001	Fair Debt Collection Practices Act	Chicago Bar Assn Chicago, Illinois
June 7, 1996	Fair Debt Collection Practices Act Overland Park, KS	Kansas City Metropolitan Bar Association
1992 - 2000	Fair Debt Collection National Consumer Rights Litigation Conference	Various locations

14 I have been involved in numerous consumer cases including:

#### U.S. COURTS OF APPEALS:

*Meza v. Portfolio Recovery Assocs., LLC*, — F.3d —, 2017 WL 2790523 (9th Cir. June 22, 2017) (certified question to California Supreme Court); *Madden v. Midland Funding, LLC*, 786 F.3d 246 (2d Cir. 2015) *cert. den.* — S.Ct. —, 2016 WL 3461580 (Mem. June 27, 2016) (non-national bank entities are not entitled to protection under the NBA); *Walker v. Financial Recovery Services, Inc.*, --- Fed.Appx. ----, 2015 WL 1383233 (11<sup>th</sup> Cir., March 27, 2015) (offer of judgment); *Powers v. Credit Management Services, Inc.*, 776 F.3d 567 (8<sup>th</sup> Cir. 2015) (class certification reversed); *Mais v. Gulf*

Coast Collection Bureau, Inc., 768 F.3d 1110 (11th Cir. 2014) (TCPA); Randle v. H & P Capital, Inc., 513 Fed.Appx. 282 (4th Cir. 2013) (attorneys fees); Anchondo v. Dunn, 511 Fed.Appx. 736 (10th Cir. 2013) (sanctions award); Gonzales v. Arrow Financial Services, LLC, 660 F.3d 1055 (9<sup>th</sup> Cir. 2011); Anchondo v. Anderson, Crenshaw & Associates, L.L.C., 616 F.3d 1098 (10<sup>th</sup> Cir. 2010) (attorneys fees); Rannis v. Recchia, 380 Fed.App. 646 (9<sup>th</sup> Cir. 2010) (CROA); Imperial Merchant Services, Inc. v. Hunt, 580 F.3d 893 (9<sup>th</sup> Cir. 2009) (debt collector may recover check fee or interest on dishonored check, not both); Imperial Merchant Services, Inc. v. Hunt, 47 Cal.4th 381, 212 P.3d 736 (Cal. 2009), Hunt v. Imperial Merchant Services, Inc., 560 F.3d 1137 (9<sup>th</sup> Cir. 2009) (shift class notice costs); McKinney v. Cadleway Properties, Inc., 548 F.3d 496 (7<sup>th</sup> Cir. 2008); Camacho v. Bridgeport Financial, Inc., 523 F.3d 973 (9<sup>th</sup> Cir. 2008) (attorneys fees); del Campo v. Kennedy, 517 F.3d 1070 (9<sup>th</sup> Cir. 2008); Johnson v. Credit Int'l, 257 Fed. Appx. 8 (9<sup>th</sup> Cir., Nov. 8, 2007); Rosario v. American Corrective Counseling Services, Inc., 506 F.3d 1039 (11<sup>th</sup> Cir. 2007); Gillespie v. Equifax Information Services, L.L.C., 484 F.3d 938 (7th Cir. 2007); Defenbaugh v. JBC & Assocs. PC, 2006 U.S. App. LEXIS 19930 (9<sup>th</sup> Cir., July 24, 2006) (Not for Publication); Camacho v. Bridgeport Financial, Inc., 430 F.3d 1078 (9<sup>th</sup> Cir. 2005) (§1692g(a)(3) dispute of the debt need not be “in writing”); Carroll v. United

Compucred Collections, Inc., 399 F.3d 620 (6th Cir. 2005) (class certification); Silvernail v. County of Kent, 385 F.3d 601 (6th Cir. 2004); Irwin v. Mascott, 370 F.3d 924 (9th Cir. 2004); Liles v. American Corrective Counseling Services, 350 F.3d 742 (8th Cir. 2003); Carmichael v. Payment Ctr., Inc., 336 F.3d 636 (7th Cir. 2003); Renick v. Dun & Bradstreet Receivable MgmtSrvs., 290 F.3d 1055 (9th Cir. 2002); Romine v. Diversified Collection Services, Inc., 155 F.3d 1142 (9th Cir. 1998); Ladick v. Van Gement, 146 F.3d 1205 (10th Cir. 1998), *cert. den.* 119 S.Ct. 511 (1998); Zagorski v. Midwest Billing Services, Inc., 128 F.3d 1164 (7th Cir. 1997); Bartlett v. Heibl, 128 F.3d 497 (7th Cir. 1997); Tolentino v. Friedman, 46 F.3d 645 (7th Cir. 1995); Wright v. Finance Service of Norwalk, Inc., 22 F.3d 647 (6th Cir. 1994); Dutton v. Wolpoff and Abramson, 5 F.3d 649 (3d Cir. 1993); Hollis v. Roberts, 984 F.2d 1159 (11th Cir. 1993); Carroll v. Wolpoff & Abramson, 961 F.2d 459 (4th Cir. 1992); Graziano v. Harrison, 950 F.2d 107 (3d Cir. 1991); Miller v. Payco-General American Credits, Inc., 943 F.2d 482 (4th Cir. 1991); Anderson v. White, 885 F.2d 985 (3d Cir. 1989); Pipiles v. Credit Bureau, Inc., 886 F.2d 22 (2d Cir. 1989); Emanuel v. American Credit Exchange, 870 F.2d 805 (2d Cir. 1989); David v. City of Scranton, 633 F.2d 676 (3d Cir. 1980).

U.S. DISTRICT COURTS - last 5 years:

Powers v. Collection Analyst, Inc., No. 8:17CV229, 2018 WL 3477967 (D. Neb. July 19, 2018) (preliminary approval of class settlement); Powers v. Collection Analyst, Inc., No. 8:17CV229, 2018 WL 3489622 (D. Neb. June 28, 2018), report and recommendation adopted sub nom. Powers v. Collection Analyst, Inc., No. 8:17CV229, 2018 WL 3477967 (D. Neb. July 19, 2018); Bassett v. Credit Management Services, Inc., No. 8:17CV69, 2018 WL 3159790 (D. Neb. June 28, 2018) (summary judgment); Bassett V. Credit Management Services, Inc., No. 8:17CV69, 2018 WL 3159791 (D. Neb. June 28, 2018) (class certified); Oyola v. Midland Funding, LLC, 295 F. Supp. 3d 14 (D. Mass. 2018) (arbitration compelled); Washington v. Brumbaugh & Quandahl, P.C., LLO. No. 8:15-CV-444, 2017 WL 4174754 (D. Neb. Sept. 19, 2017) (class certification and summary judgment); Bassett v. Credit Mgmt. Servs., Inc., No. 8:17CV69, 2017 WL 6598500 (D. Neb. Aug. 11, 2017) (certify questions to Neb. Sup. Ct.); Meeks v. Nat'l Account Sys. of Omaha, LLC, No. 8:16CV513, 2017 WL 1292371 (D. Neb. Apr. 7, 2017) (protective order); Masson v. Pioneer Credit Recovery, Inc., No. CV 16J1887, 2017 WL 819099 (E.D. La. Mar. 2, 2017) (summary judgment); Madden v. Midland Funding, LLC, — F.Supp.3d —, 2017 WL 758518 (S.D.N.Y. Feb. 27, 2017) (class certification and summary judgment); Jacobson v. Persolve, LLC, No. 14JCVJ00735JLHK, 2016 WL 7230873 (N.D. Cal. Dec. 14, 2016) (attorneys fees);

Powers v. Credit Mgmt. Servs., Inc., No. 8:11CV436, 2016 WL 6993743 (D. Neb. Nov. 29, 2016) (final Approval of class settlement); Powers v. Credit Mgmt. Servs., Inc., No. 8:11CV436, 2016 WL 6994080 (D. Neb. Nov. 29, 2016) (attorneys fees and incentive award); Washington v. Brumbaugh & Quandahl, P.C., LLO., No. 8:15CV444, 2016 WL 4734393 (D. Neb. Sept. 9, 2016) (amended complaint); Powers v. Credit Mgmt. Servs., Inc., 2016 WL 3983250 (D. Neb. July 25, 2016) (preliminary approval of class settlement); Datta v. Asset Recovery Sols., LLC, No. 15 CV 00188 LHK, 2016 WL 3163142 (N.D. Cal. June 7, 2016) (summary judgment); Reynolds v. Credit Bureau Servs., Inc., No. 8:15CV168, 2016 WL 2864411 (D. Neb. May 16, 2016) (attorneys fees); Reynolds v. Credit Bureau Servs., Inc., No. 8:15CV168, 2016 WL 2859604 (D. Neb. May 16, 2016) (final approval of class settlement); Palmer v. Dynamic Recovery Sols., LLC, No. 6:15CV595ORLJ40KRS, 2016 WL 2348704 (M.D. Fla. May 4, 2016) (deny class settlement); Washington V. Brumbaugh & Quandahl, P.C., LLO., No. 8:15CV444, 2016 WL 1435665 (D. Neb. Apr. 11, 2016) (motion to dismiss); Gary D. Smith vs. Gurstel Chargo, PA, 2016 WL 1312527 (D. Neb. Apr. 4, 2016) (supplemental award of attorneys fees); Kenneth Reynolds, on behalf of himself & all others similarly situated, vs. ARL Credit Services, Inc., Donette Jablonski, and Richard Jablonski, 2016 WL 1257862 (D. Neb. Mar. 30, 2016) (final approval of class settlement); Datta v.

Asset Recovery Sols., LLC, No. 15JCVJ00188JLHK, 2016 WL 1070666 (N.D. Cal. Mar. 18, 2016) (class certified); Reynolds v. Credit Mgmt. Servs., Inc., No. 8:14CV391, 2016 WL 756469 (D. Neb. Feb. 25, 2016) (summary judgment and class certification); Jenkins v. Pech, No. 8:14CV41, 2016 WL 715780 (D. Neb. Feb. 22, 2016) (attorneys fees); Powers v. Credit Mgmt. Servs., Inc., No. 8:11CV436, 2016 WL 612251 (D. Neb. Feb. 2, 2016) (summary judgment); Powers v. Credit Mgmt. Servs., Inc., 313 F.R.D. 103 (D. Neb. 2016) (class certified); Reynolds v. Credit Bureau Servs., Inc., No. 8:15CV168, 2016 WL 389977 (D. Neb. Feb. 1, 2016) (class certification and preliminary approval order); Riffle v. Convergent Outsourcing, Inc., 311 F.R.D. 677 (M.D. Fla. 2015) (class cert den); Jenkins v. Pech, No. 8:14CV41, 2015 WL 6738624 (D. Neb. Nov. 4, 2015) (preliminary approval of class settlement); Meza v. Portfolio Recovery Associates, LLC, No. 14JCVJ03486JLHK, --- F.Supp.3d ---, 2015 WL 5138501 (N.D. Cal. Sept. 1, 2015) (summary judgment); Krulee v. Receivables Performance Mgmt., LLC, No. 5:14JCVJ02860JRMW, 2015 WL 4624082 (N.D. Cal. Aug. 3, 2015) (defendant's motion for attorney's fees denied); Jenkins v. Pech, No. 8:14CV41, 2015 WL 3872388 (D. Neb. June 23, 2015) (compel subpoenaed bank records); Jenkins v. Pech, No. 8:14CV41, 2015 WL 3658261 (D. Neb. June 12, 2015) (class certified); Krulee v. Receivables Performance Mgmt., LLC, No.



5:14-cv-02860-RMW, 2015 WL 3638546 (N.D. Cal. June 11, 2015) (compel arbitration); Jacobson v. Persolve, LLC, No. 14-CV-00735 LHK, 2015 WL 3523696 (N.D. Cal. June 4, 2015) (class certified); Jacobson v. Persolve, LLC, 2015 WL 2061712 (N.D. Cal. May 1, 2015) (deny SAC); Spurgeon v. Frederick J. Hanna & Assoc., 2015 WL 1246157 (D.Neb., March 17, 2015) (motion to dismiss); Gold v. Midland Credit Management, Inc., --- F.Supp.3d ----, 2015 WL 1037700 (N.D.Cal., March 10, 2015) (summary judgment); Davis v. CACH, LLC, 2015 WL 913392 (N.D.Cal., 2015) (arbitration compelled); Jenkins v. Pech, 2015 WL 728305 (D.Neb., Feb. 19, 2015) (compel subpoena); James v. Portfolio Recovery Associates, LLC, 2015 WL 720195 (N.D.Cal., Feb. 20, 2015) (arbitration compelled); In re: Convergent Outsourcing, Inc., Fair Debt, --- F.Supp.3d ----, 2015 WL 506393 (U.S.Jud.Pan.Mult.Lit., Feb. 5, 2015) (MDL denied); Haynes v. Allied Interstate, LLC, 2015 WL 429800 (D.Neb., Feb. 2, 2015); Smith v. Gurstel Chargo, PA, 2014 WL 6453772 (D.Neb., Nov. 17, 2014) (preliminary approval order); Gold v. Midland Credit Management, Inc., --- F.R.D. ----, 2014 WL 5026270 (N.D.Cal., Oct. 7, 2014) (class certified); Mazur v. National Account Systems of Omaha, LLC, 2014 WL 4264798 (D.Neb., Aug. 29, 2014) (preliminary approval of class settlement); Jenkins v. Pech, 301 F.R.D. 401 (D.Neb. 2014) (MTD denied - OJ did not moot class claim);

Jacobson v. Persolve, LLC, 2014 WL 4090809 (N.D. Cal. Aug. 14, 2014) (Rule 68 offer of judgment made before the filing of a class certification motion does not moot the putative class allegations); Gold v. Midland Credit Management, Inc., 2014 WL 3371012 (N.D.Cal., July 9, 2014) (compel 30(b)(6) witness); Gold v. Midland Credit Management, Inc., 2014 WL 3371429 (N.D.Cal., July 9, 2014) (compel discovery responses); Henggeler v. Brumbaugh & Quandahl, P.C., LLO, 2014 WL 793544 (D.Neb., Feb. 26, 2014) (attorneys fees); Gold v. Midland Credit Management, Inc., 2014 WL 767732 (N.D.Cal., Feb. 20, 2014) (discovery compelled); Birge v. Brumbaugh & Quandahl, P.S., LLO, 2014 WL 688966 (D.Neb., Feb. 26, 2014) (attorneys' fees); Birge v. Smeall, 2013 WL 6631653 (D.Neb., Dec. 17, 2013) (motion to dismiss); Henggeler v. Brumbaugh & Quandahl P.C., 2013 WL 5881422 (D.Neb., Oct. 25, 2013) (preliminary approval of class action settlement); Hernandez v. Guglielmo, 977 F.Supp. 1054 (D.Nev. 2013) (statutory damages); Birge v. Smeall, 2013 WL 5789273 (D.Neb., Sept. 20, 2013) (motion to dismiss); del Campo v. Mealing, 2013 WL 4764975 (N.D.Cal., Sept. 5, 2013) (summary judgment); Santiago v. Equable Ascent Financial, 2013 WL 3498079 (N.D.Cal., July 12, 2013) (attorneys fees);(reconsider class cert denied); Mais v. Gulf Coast Collection Bureau, Inc., 944 F.Supp.2d 1226 (S.D.Fla., May 8, 2013) (TCPA summary judgment), rev'd --- F.3d ----,

2014 WL 4802457 (11th Cir., Sept. 29, 2014); Manno v. Healthcare Revenue Recovery Group, LLC, 289 F.R.D. 674 (S.D.Fla. 2013) (TCPA and FDCPA classes certified); Donnelly-Tovar v. Select Portfolio Servicing, Inc., 945 F.Supp.2d 1037 (D.Neb. 2013) (deny motion to dismiss); Erickson v. Credit Bureau Services, Inc., 2013 WL 672281 (D.Neb., Feb. 22, 2013) (attorneys fees); Erickson v. Credit Bureau Services, Inc., 2013 WL 672313 (D.Neb., Feb. 22, 2013) (class settlement approved).

Executed in Chicago, Illinois on Novwmbner 9, 2018.

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